

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|---------------------------|---|----------------------------|
| AMIR MUHAMMED, |) | |
| |) | |
| PLAINTIFF, |) | |
| |) | |
| v. |) | Civil Action No. |
| |) | |
| CITY OF ST. LOUIS, |) | |
| |) | |
| |) | JURY TRIAL DEMANDED |
| DEFENDANT. |) | |

NOTICE OF REMOVAL TO FEDERAL COURT

Defendant City of St. Louis (“Defendant”) notifies this Court of the removal of *Muhammed v. City of St. Louis, et al.*, Cause No. 1822-CC11115, from the 22nd Judicial Circuit Court of Missouri, to the U.S. District Court for the Eastern District of Missouri. As grounds for removal, Defendant states:

1. On August 28, 2018, Plaintiff Amir Muhammed (“Plaintiff”) filed suit against Defendant in the 22nd Judicial Circuit Court of Missouri, in *Muhammed v. City of St. Louis, et al.*, Cause No. 1822-CC11115.
2. Plaintiff effected service on City on September 17, 2018.
3. City files this notice within thirty days after service, making removal timely under 28 U.S.C. § 1446(b) and *Murphy Brothers, Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 354-355 (1999).
4. Pursuant to Local Rule 2.03, a copy of all process, pleadings, orders and other documents on file in state court are attached as Exhibit A.
5. Venue is proper in this District under 28 U.S.C. § 1441(a), because this District and Division embrace the place in which the removed action has been pending.
6. Plaintiff alleges violations of his rights pursuant to Title VII of the Civil Rights Act, thus this Court has original jurisdiction under 28 U.S.C. § 1331.
7. City concurrently submits the filing fee in the amount of \$400.00 and the proof of filing the notice of removal with the Clerk and State court.

WHEREFORE, City petitions this Court for removal of *Muhammed v. City of St. Louis*, Cause No. 1822-CC11115, from the 22nd Judicial Circuit Court of Missouri, to this Court for all further proceedings.

Respectfully submitted,

JULIAN BUSH
CITY COUNSELOR

/s/ Alexis L. Silsbe

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify this Notice was electronically filed with the Court for service on October 15, 2018.

/s/ Alexis L. Silsbe